

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

CLIFFORD FERRIN,

Plaintiff,

vs.

JANSSEN PHARMACEUTICA, L.P., et al.,

Defendants.

Cause No. 05CV01923-HEA

JURY TRIAL DEMANDED

8.31.06
granted
[Signature]

MOTION TO CONSOLIDATE ACTIONS

Comes now Defendant Janssen, L.P., in consultation with counsel for Plaintiffs, and request that the following cases be consolidated before this Court for scheduling and pre-trial purposes only:

Sharon Beggs v. Janssen Pharmaceutica, 06-cv-1006 CDP

Doris Heathman v. Janssen Pharmaceutica, 06-cv-1089 CAS

Tammy Lilly v. Janssen Pharmaceutica, 06-cv-1171 CEJ

Michael Simmons v. Janssen Pharmaceutica, 05-cv-02245 ERW

Amy Tolbert v. Janssen Pharmaceutica, 06-cv-1146 SNL

Consolidation of these proceedings will reduce the burden on the courts and the litigants. It will also promote judicial efficiency and consistency with respect to discovery and common pre-trial issues, prior to co-defendants being severed where appropriate, and the cases being set for trials on an individual plaintiff basis.

WHEREFORE, Janssen hereby requests that the Court issue an Order consolidating these cases before the Honorable Henry E. Autrey, and that a scheduling conference be set thereafter to develop a coordinated plan for discovery and pre-trial matters.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing pleading was served via the Court's electronic filing system upon all counsel of record.

/s/ Jennifer S. Kingston